



U.S. Department of Justice

Antitrust Division

*San Francisco Office
450 Golden Gate Avenue, Suite 10-0101
San Francisco, CA 94102*

January 26, 2024

Via Email

Andrew Ewalt, Esq.
Freshfields Bruckhaus Deringer US LLP
700 13th Street NW, 10th Floor
Washington, DC 20005-3960
andrew.ewalt@freshfields.com

Re: *United States, et al. v. Google LLC, No. 1:23-cv-108 (E.D. Va.)*

Dear Counsel:

I write to follow up on the service of Google's expert reports on January 23. Pursuant to the ESI Order in force in this case, ECF No. 124, Plaintiffs request that Google conduct a reasonable search for documents corresponding with any hyperlinks in the Bates-numbered documents listed in Appendix A to this letter. Given the abbreviated nature of Plaintiffs' rebuttal report period, Plaintiffs request that Google produce or, if a linked document exists in a previous Google production, specifically identify by Bates number any documents corresponding to hyperlinks by Wednesday, January 31.

The documents listed in Appendix A are documents specifically listed as documents on which one or more Google experts relied. These documents contain hyperlinks for which Plaintiffs do not have any linked documents or cannot independently confirm that any documents listed in metadata are the result of hyperlinks within those documents.

If you have any questions about this letter or would like to have a follow-up conversation, I can be contacted via email at Brent.Nakamura@usdoj.gov or by phone at (415) 205-3248

Sincerely,

Brent K. Nakamura
Brent K. Nakamura
Trial Attorney
Antitrust Division
U.S. Department of Justice

APPENDIX A

GOOG-AT-MDL-001056062
GOOG-AT-MDL-001094067
GOOG-AT-MDL-001138488
GOOG-AT-MDL-001397473
GOOG-AT-MDL-001412832
GOOG-AT-MDL-001969523
GOOG-AT-MDL-002293467
GOOG-AT-MDL-003206332
GOOG-AT-MDL-003465605
GOOG-AT-MDL-003530782
GOOG-AT-MDL-003976677
GOOG-AT-MDL-003977297
GOOG-AT-MDL-004039971
GOOG-AT-MDL-004211974
GOOG-AT-MDL-004326981
GOOG-AT-MDL-004416876
GOOG-AT-MDL-004548615
GOOG-AT-MDL-004555239
GOOG-AT-MDL-006192360
GOOG-AT-MDL-006194638
GOOG-AT-MDL-006217592
GOOG-AT-MDL-006609824
GOOG-AT-MDL-006876286
GOOG-AT-MDL-007017426
GOOG-AT-MDL-007104041
GOOG-AT-MDL-007210197
GOOG-AT-MDL-007366768
GOOG-AT-MDL-007374059
GOOG-AT-MDL-007375273
GOOG-AT-MDL-007451589
GOOG-AT-MDL-008228528
GOOG-AT-MDL-008930610
GOOG-AT-MDL-008930621
GOOG-AT-MDL-008930629
GOOG-AT-MDL-008930642
GOOG-AT-MDL-008930706
GOOG-AT-MDL-008930754
GOOG-AT-MDL-009017857
GOOG-AT-MDL-009068311
GOOG-AT-MDL-009118929
GOOG-AT-MDL-009293665
GOOG-AT-MDL-009440238
GOOG-AT-MDL-009555706
GOOG-AT-MDL-009590544
GOOG-AT-MDL-009590561
GOOG-AT-MDL-009643893

GOOG-AT-MDL-009644018
GOOG-AT-MDL-009644150
GOOG-AT-MDL-009644236
GOOG-AT-MDL-009644238
GOOG-AT-MDL-009703214
GOOG-AT-MDL-009703454
GOOG-AT-MDL-009709671
GOOG-AT-MDL-009709864
GOOG-AT-MDL-009755689
GOOG-AT-MDL-009756999
GOOG-AT-MDL-009766729
GOOG-AT-MDL-009839146
GOOG-AT-MDL-011687180
GOOG-AT-MDL-012551468
GOOG-AT-MDL-012701069
GOOG-AT-MDL-012978414
GOOG-AT-MDL-013435568
GOOG-AT-MDL-015133684
GOOG-AT-MDL-015133962
GOOG-AT-MDL-015269020
GOOG-AT-MDL-016761951
GOOG-AT-MDL-019215294
GOOG-AT-MDL-019215643
GOOG-AT-MDL-019245395
GOOG-AT-MDL-019245435
GOOG-DOJ-02139596
GOOG-DOJ-02845394
GOOG-DOJ-02854344
GOOG-DOJ-03366173
GOOG-DOJ-03516570
GOOG-DOJ-03604468
GOOG-DOJ-03610002
GOOG-DOJ-03619484
GOOG-DOJ-03637905
GOOG-DOJ-03642313
GOOG-DOJ-03648463
GOOG-DOJ-03876025
GOOG-DOJ-03893236
GOOG-DOJ-03901693
GOOG-DOJ-03998505
GOOG-DOJ-04387378
GOOG-DOJ-04403503
GOOG-DOJ-04405315
GOOG-DOJ-04427670
GOOG-DOJ-04430492
GOOG-DOJ-04600090
GOOG-DOJ-04602586
GOOG-DOJ-04735025

GOOG-DOJ-04736246
GOOG-DOJ-04937154
GOOG-DOJ-05247255
GOOG-DOJ-05250916
GOOG-DOJ-05276941
GOOG-DOJ-05277571
GOOG-DOJ-05282625
GOOG-DOJ-05283173
GOOG-DOJ-05287436
GOOG-DOJ-05310281
GOOG-DOJ-05326023
GOOG-DOJ-06134599
GOOG-DOJ-06206871
GOOG-DOJ-06229841
GOOG-DOJ-06241817
GOOG-DOJ-06525908
GOOG-DOJ-06563186
GOOG-DOJ-06829061
GOOG-DOJ-06875572
GOOG-DOJ-07227229
GOOG-DOJ-07285073
GOOG-DOJ-07782646
GOOG-DOJ-07802579
GOOG-DOJ-07824949
GOOG-DOJ-09141884
GOOG-DOJ-09163089
GOOG-DOJ-09183023
GOOG-DOJ-09434884
GOOG-DOJ-09463398
GOOG-DOJ-09475820
GOOG-DOJ-09480352
GOOG-DOJ-09689850
GOOG-DOJ-09712720
GOOG-DOJ-09714662
GOOG-DOJ-09731684
GOOG-DOJ-09841308
GOOG-DOJ-09916352
GOOG-DOJ-09948715
GOOG-DOJ-09948834
GOOG-DOJ-10254419
GOOG-DOJ-10519181
GOOG-DOJ-10570181
GOOG-DOJ-10590974
GOOG-DOJ-10664747
GOOG-DOJ-10670767
GOOG-DOJ-10708472
GOOG-DOJ-10806862
GOOG-DOJ-10915097

GOOG-DOJ-10924270
GOOG-DOJ-10924698
GOOG-DOJ-10924864
GOOG-DOJ-10957546
GOOG-DOJ-11247631
GOOG-DOJ-11357824
GOOG-DOJ-11697964
GOOG-DOJ-11726308
GOOG-DOJ-11733358
GOOG-DOJ-11733552
GOOG-DOJ-11753371
GOOG-DOJ-11770230
GOOG-DOJ-11782962
GOOG-DOJ-11785945
GOOG-DOJ-11788944
GOOG-DOJ-11790760
GOOG-DOJ-11795442
GOOG-DOJ-11862779
GOOG-DOJ-12038253
GOOG-DOJ-12112128
GOOG-DOJ-12408302
GOOG-DOJ-12443562
GOOG-DOJ-12508183
GOOG-DOJ-12634156
GOOG-DOJ-12700489
GOOG-DOJ-12782281
GOOG-DOJ-12848608
GOOG-DOJ-12946953
GOOG-DOJ-13197448
GOOG-DOJ-13199584
GOOG-DOJ-13199952
GOOG-DOJ-13200998
GOOG-DOJ-13202659
GOOG-DOJ-13203643
GOOG-DOJ-13205869
GOOG-DOJ-13207875
GOOG-DOJ-13208074
GOOG-DOJ-13208758
GOOG-DOJ-13208800
GOOG-DOJ-13212948
GOOG-DOJ-13221355
GOOG-DOJ-13226855
GOOG-DOJ-13227256
GOOG-DOJ-13228856
GOOG-DOJ-13235100
GOOG-DOJ-13235212
GOOG-DOJ-13273702
GOOG-DOJ-13284614

GOOG-DOJ-13351316
GOOG-DOJ-13364449
GOOG-DOJ-13402499
GOOG-DOJ-13469175
GOOG-DOJ-13480672
GOOG-DOJ-13501237
GOOG-DOJ-13518329
GOOG-DOJ-13521136
GOOG-DOJ-13557023
GOOG-DOJ-13579782
GOOG-DOJ-13596560
GOOG-DOJ-13605152
GOOG-DOJ-13615208
GOOG-DOJ-13619370
GOOG-DOJ-13625417
GOOG-DOJ-13627809
GOOG-DOJ-13949282
GOOG-DOJ-13952875
GOOG-DOJ-13979867
GOOG-DOJ-14024199
GOOG-DOJ-14045067
GOOG-DOJ-14260375
GOOG-DOJ-14298902
GOOG-DOJ-14368357
GOOG-DOJ-14398809
GOOG-DOJ-14422334
GOOG-DOJ-14524624
GOOG-DOJ-14549757
GOOG-DOJ-14550102
GOOG-DOJ-14566285
GOOG-DOJ-14663359
GOOG-DOJ-14718514
GOOG-DOJ-14952787
GOOG-DOJ-15068390
GOOG-DOJ-15119015
GOOG-DOJ-15123582
GOOG-DOJ-15130321
GOOG-DOJ-15151724
GOOG-DOJ-15159990
GOOG-DOJ-15189434
GOOG-DOJ-15208416
GOOG-DOJ-15214159
GOOG-DOJ-15232606
GOOG-DOJ-15254730
GOOG-DOJ-15264552
GOOG-DOJ-15389438
GOOG-DOJ-15407321
GOOG-DOJ-15416614

GOOG-DOJ-15601956
GOOG-DOJ-15637938
GOOG-DOJ-15730729
GOOG-DOJ-15743853
GOOG-DOJ-15768395
GOOG-DOJ-27803533
GOOG-DOJ-28502334
GOOG-DOJ-29389832
GOOG-DOJ-32261273
GOOG-DOJ-AT-00037032
GOOG-DOJ-AT-00055901
GOOG-DOJ-AT-00312340
GOOG-DOJ-AT-00330626
GOOG-DOJ-AT-00569936
GOOG-DOJ-AT-00581461
GOOG-DOJ-AT-00593475
GOOG-DOJ-AT-00655825
GOOG-DOJ-AT-00832761
GOOG-DOJ-AT-01027937
GOOG-DOJ-AT-01451479
GOOG-DOJ-AT-01901429
GOOG-DOJ-AT-02096475
GOOG-DOJ-AT-02096733
GOOG-DOJ-AT-02096796
GOOG-DOJ-AT-02160057
GOOG-DOJ-AT-02199478
GOOG-DOJ-AT-02225544
GOOG-DOJ-AT-02255861
GOOG-DOJ-AT-02307442
GOOG-DOJ-AT-02321586
GOOG-DOJ-AT-02324779
GOOG-DOJ-AT-02325870
GOOG-DOJ-AT-02326002
GOOG-DOJ-AT-02427435
GOOG-DOJ-AT-02433387
GOOG-DOJ-AT-02442921
GOOG-DOJ-AT-02467209
GOOG-DOJ-AT-02471119
GOOG-DOJ-AT-02480338
GOOG-DOJ-AT-02480384
GOOG-DOJ-AT-02512856
GOOG-DOJ-AT-02512863
GOOG-DOJ-AT-02639476
GOOG-DOJ-AT-02640072
GOOG-DOJ-AT-02643272
GOOG-DOJ-AT-02645470
GOOG-DOJ-AT-02645766
GOOG-DOJ-AT-02645892

GOOG-DOJ-AT-02647839
GOOG-DOJ-AT-02647850
GOOG-DOJ-AT-02649859
GOOG-DOJ-AT-02649868
GOOG-DOJ-AT-02649870
GOOG-TEX-00048091
GOOG-TEX-00069680
GOOG-TEX-00082536
GOOG-TEX-00106259
GOOG-TEX-00110023
GOOG-TEX-00124296
GOOG-TEX-00139438
GOOG-TEX-00439764